

**IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO – Western Division at Cincinnati**

**HUNTER DOSTER, et. al.** : Case No. 1:22-CV-84

Plaintiffs :

**v.** :

**FRANK KENDALL, et. al.** :

Defendants :

**DECLARATION OF CHRISTOPHER SCHULDES**

Pursuant to 28 U.S.C. §1746, the undersigned, Christopher Schuldes, makes the following declaration, under penalty of perjury under the laws of the United States of America, that the facts contained herein are true and correct to the best of my knowledge and belief and that such facts are made based on my personal knowledge:

1. My name is Christopher Schuldes, and I am a class representative in the above captioned matter. I am a Senior Master Sergeant in the Air Force and currently serve as an active reservist.
2. I sought, but was denied, a religious accommodation from the COVID-19 vaccination requirement. I appealed that, but the appeal was also denied.
3. As a result, I was given notification that I was being transferred to a no-points, no-pay status in January 2022, and notified that I was being involuntarily transferred to the Individual Ready Reserve in February 2022, in which I did not earn pay or points.
4. I remained in a no-points, no-pay status until the issuance of the class-wide injunction in this matter, in July 2022. Because of that injunction, I was able to return to pay, points, and drill status in September 2022, and thereafter remained on active reserve duty.

5. Consequently, I missed drill weekends from January through August 2022, comprising of 32 reserve points.
6. As a result, I lost \$3,436.64 of drill pay.
7. Much more significantly, I also lost reserve retirement credit, which is calculated in points, and I specifically lost 32 reserve retirement points for the drill weekends I was not able to attend.
8. That resulted in me not receiving retirement credit for 2022, as I did not accrue enough points, though if I had received credit for the 32 lost reserve retirement points, 2022 would have been a “good year.”
9. This lost “good year” will require me to serve for another year longer than I would otherwise have, to be eligible for retirement.
10. These lost retirement points are also detrimental because a member’s reserve retirement points are calculated in retirement pay calculations. As a result, unless corrected by order of the court, I ultimately will draw less retirement pay when I retire, because of the discipline taken against me for refusing the COVID vaccine.
11. I am unaware of any policies, directives, or similar enactments from Department of Defense or Air Force officials to restore lost drill pay or lost retirement points, unlike other corrective action that has been taken. I am unaware of any intention to make this corrective action in the future.

Pursuant to 28 U.S.C. §1746, I declare under penalties of perjury under the laws of the United States of America that the foregoing Declaration is true and correct to the best of my knowledge and belief and that such facts are made based on my personal knowledge.

Executed on January 31, 2024



Christopher Schuldes